

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831-MFW

(Jointly Administered)

Re: D.I. 437

**CERTIFICATE OF NO OBJECTION REGARDING EDWARD HIGHTOWER AND
ADAM KROLL’S MOTION FOR RELIEF FROM THE AUTOMATIC STAY, TO THE
EXTENT APPLICABLE, TO PERMIT PAYMENT, REIMBURSEMENT AND/OR
ADVANCEMENT OF DEFENSE COSTS AND FEES, AND RELATED EXPENSES,
UNDER DIRECTORS AND OFFICERS INSURANCE POLICIES**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading has been received to *Edward Hightower and Adam Kroll’s Motion for Relief From the Automatic Stay, to the Extent Applicable, to Permit Payment, Reimbursement and/or Advancement of Defense Costs and Fees, and Related Expenses, Under Directors and Officers Insurance Policies* [D.I. 437] (the “Motion”) filed on September 19, 2023. The undersigned further certifies that after reviewing the Court’s docket in the above-captioned cases, no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the *Notice of Edward Hightower and Adam Kroll’s Motion for Relief From the Automatic Stay, to the Extent Applicable, to Permit Payment, Reimbursement and/or Advancement of Defense Costs and Fees, and Related Expenses, Under Directors and Officers Insurance Policies* [D.I. 437-5], objections to the Motion were to be filed and served no later than September 28, 2023, at 4:00 p.m. (ET).

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¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (“LMC”) (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

It is hereby respectfully requested that the Order attached to the Motion as Exhibit A be entered at the earliest convenience of the Court.

Dated: September 29, 2023

Respectfully submitted,

/s/ Jennifer R. Hoover
Jennifer R. Hoover (DE No. 5111)
Steven L. Walsh (DE No. 6499)
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